

To:
Case Management
Providers
Prenatal Care
Coordination
Providers
HMOs and Other
Managed Care
Programs

Electronic Documentation Requirements for Case Management and Prenatal Care Coordination Providers

This *Wisconsin Medicaid and BadgerCare Update* clarifies Wisconsin Medicaid requirements for electronic documentation and electronic signatures.

Electronic Documentation — General Requirements

This *Wisconsin Medicaid and BadgerCare Update* clarifies Wisconsin Medicaid electronic documentation requirements for case management providers and prenatal care coordination providers.

Documentation must be kept in each recipient's record as required under HFS 106.02(9), Wis. Admin. Code. Records kept electronically are subject to the same requirements as those maintained on paper. In addition, the following requirements apply to electronic documentation:

- Providers are required to have a paper or electronic back-up system for electronic documentation. This could include having files saved on disk or CD in case of computer failure.
- For audits conducted by the Division of Health Care Financing, providers are required to produce paper copies of electronic records upon request.
- Providers are required to have safeguards to prevent unauthorized access to the records.

Providers are required to have the signature of the individual performing each service and maintain each signature in their records. Throughout this *Update*, this individual is referred to as the “performer.”

Refer to the Provider Rights and Responsibilities section of the All-Provider Handbook for general information on preparing and maintaining records.

Electronic Signature Standards

Wisconsin Medicaid accepts electronic signatures as long as the provider has established policies and procedures regarding the use of electronic signatures. Providers are required to meet the following guidelines when using electronic signatures:

- The electronic signature of the performing provider must be under the sole control of that individual. Only the performer has the authority to use his or her electronic signature.
- Documentation must show the electronic signature that belongs to each performer. For example, if a performer uses a number, the provider is required to maintain a confidential list that contains the performer's name and corresponding electronic signature number.

The following are examples of electronic signatures:

- *Typed name* — performer may type his or her complete name.
- *Number* — performer may type a number unique to him or her.
- *Initials* — performer may type initials unique to him or her.

No one may sign on behalf of the performer. Also, the performer is required to review, sign, and date each entry in a recipient's record when information is entered on the performer's behalf.

Medical Records Requiring a Signature

The following are examples of records requiring either a handwritten or electronic signature:

- Assessments.
- Case plans.
- Progress notes.
- All contacts with, or on behalf of, a recipient.

Information Regarding Medicaid HMOs

This *Update* contains Medicaid fee-for-service policy and applies to providers of services to recipients on fee-for-service Medicaid only. For Medicaid HMO or managed care policy, contact the appropriate managed care organization. Wisconsin Medicaid HMOs are required to provide at least the same benefits as those provided under fee-for-service arrangements.

The *Wisconsin Medicaid and BadgerCare Update* is the first source of program policy and billing information for providers.

Although the *Update* refers to Medicaid recipients, all information applies to BadgerCare recipients also.

Wisconsin Medicaid and BadgerCare are administered by the Division of Health Care Financing, Wisconsin Department of Health and Family Services, P.O. Box 309, Madison, WI 53701-0309.

For questions, call Provider Services at (800) 947-9627 or (608) 221-9883 or visit our Web site at dhfs.wisconsin.gov/medicaid/.

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